

P O R T E R | S C O T T

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STANISLAUS COUNTY, JUSTIN CAMARA, ZA XIONG, ERIC BAVARO

(Exempt from Filing Fees Pursuant to Government Code § 6103)

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA

DOROTHEY HEIMBACH, individually and
as successor in interest to Anthony Silva,

Plaintiff,

v.

STANISLAUS COUNTY; and JUSTIN
CAMARA, ZA XIONG, and ERIC
BAVARO, in their individual capacities,

Defendants.

Case No. 2:23-cv-01887-DJC-CSK

**DEFENDANTS' OBJECTIONS TO
PLAINTIFF'S EXHIBITS FOR TRIAL**

Defendants submit the following objections to Plaintiff's identified exhibits for trial (ECF No. 40):

<u>Number</u>	<u>Description</u>	<u>Objection</u>
31	Use-of-force form (DEF 0083-0084)	FRE 401, 403
34-47	Dispatch/Radio Communications DEF 00067-00080.WAV	FRE 401, 403, 802
48.	Estate Of Alejandro Sanchez — Second Amended	FRE 401, 403, 802; subject of

	Complaint (1:18-cv-00977-DAD-BAM)	MIL
49.	Estate Of Alejandro Sanchez — Camara Video Interview	FRE 401, 403, 802; subject of MIL
50.	Estate Of Alejandro Sanchez — Camara Deposition	FRE 401, 403, 802; subject of MIL
51.	Gonzalez v. Cnty. of Stanislaus — Complaint (2:21-at-00632)	FRE 401, 403, 802, 901; subject of MIL
55.	Isaiah Fiapule, Criminal case, CR-25-000170, Preliminary Examination, Camara Testimony	FRE 401, 403, 802, 901; subject of MIL
56.	Isaiah Fiapule, Criminal case, CR-25-000170, videos of incident	FRE 401, 403, 802, 901; subject of MIL
58.	Hospital records and photographs (PLT 000032–PLT 000186)	FRE 401, 403, 802, 901, and cumulative
59.	Hospital Records, PLT000188–PLT014285	FRE 401, 403, 802, 901, and cumulative
60.	Medical records related to Decedent’s treatment after the incident, including xray imagery and MRI imagery. PLT014286–PLT016541	FRE 401, 403, 802, 901, and cumulative
61.	Photographs of Decedent PLT 000023–PLT 000031	FRE 401, 403, 901, and cumulative
62.	Major Incident Notification SCSD Policy	FRE 401
63.	Photos and Cards. PLT 016542–016584	FRE 401, 403, 802, 901, and cumulative
66.	Za Xiong Phone Records (DEF00081)	FRE 401, 403, 802
67.	Camara Phone Records (DEF00082)	FRE 401, 403, 802

68.	Bavaro Phone Records (DEF00083)	FRE 401, 403, 802
69.	Camara Personnel File (CAMARA0001-0091)	FRE 401, 403, 802; subject of MIL
70.	Xiong Personnel File (XIONG0001-0102)	FRE 401, 403, 802; subject of MIL

Dated: December 15, 2025

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By /s/ John R. Whitefleet
John R. Whitefleet
Attorney for Defendants